

REMARKS/ARGUMENTS

Claim 44 is amended and claims 50-53 are new. Claims 16-30 and 36-53 are now pending in the application. Applicants respectfully request reexamination of the application.

Applicants acknowledge with appreciation the Examiner's indication that claims 36-38, 40-43 and 45 contain allowable subject matter. As discussed below, Applicants believe that all pending claims are allowable and the application is in condition for allowance.

Claim 44 was objected to. Applicants have amended claim 44 as suggested by the Examiner and believe that the objection is overcome. Applicants note that claim 44 was amended to overcome an objection to the claim but not for reasons of patentability.

Claims 16-30 and 46-49 were rejected under 35 U.S.C. 103(a) as unpatentable over U.S. Patent No. 6,885,202 to Slupsky (hereinafter "Slupsky") in view of U.S. Patent No. 5,838,163 to Rostoker (hereinafter "Rostoker"). Applicants respectfully traverse this rejection.

Referring to independent claim 16, Applicants note that the PTO acknowledged that Slupsky does not disclose an electrically conductive shielding plane. The PTO, however, equated Rostoker's grid of lines (Rostoker col. 6, lines 6-8) with a shielding plane and assert that it would have been obvious to combine Rostoker's grid of lines with Slupsky because Rostoker's grid of lines "provides electromagnetic (EM) shielding of the device (dies) on the wafer." Claim 16, however, recites not the mere use of a shielding plane but also a specific location for the shielding plane: "an electrically conductive shielding plane *disposed between* ones of said conductive structures and said functional circuitry of at least one of said dies" (emphasis added). The PTO equated Slupsky's wireless i/o cell 14 with the conductive structures of claim 16 and Slupsky's circuits 12 with the dies of claim 16. The PTO, however, provided no reason for a person of ordinary skill in the field to place Rostoker's grid lines between one of Slupsky's i/o cells 14 and a circuit 12. Indeed, as should be apparent from Figure 3 of Slupsky, there would appear to be no place for Rostoker's grid lines between one of Slupsky's i/o cells 14 and a circuit 12. In fact, Rostoker's grid lines are individual conductive traces each for carrying power or ground to Rostoker's dies or for use as individual probe and sense lines. (Rostoker col. 5, lines 66-67.) It would be difficult if not impractical or impossible to run such traces between an i/o cell 14 and a circuit 12. For at least the foregoing reasons, it would not have been obvious to combine Rostoker's grid lines with Slupsky by placing Rostoker's grid lines between one of

Slupsky's i/o cells 14 and a circuit 12. For at least this reason, claim 16 is patentable over Slupsky and Rostoker.

Independent claim 27 recites "an electrically conductive shielding plane *disposed between* said means for receiving a test signal and said functional circuitry of at least one of said dies" (emphasis added). At least for reasons generally similar to those discussed above with respect to claim 16, claim 27 is patentable over Slupsky and Rostoker.

Claims 17-30 and 46-53 depend from one of claim 16 or claim 27 and, at least because of that dependency, are also patentable over Slupsky and Rostoker. Moreover, claims 17-30 and 46-53 recite additional features not taught or suggested by Slupsky and Rostoker.

For example, claims 47 and 49 recite that the shielding plane substantially covers a die. Rostoker does not show grid lines substantially covering a circuit 12. As another example, claim 50 recites that "the shielding plane comprises openings through which the conductive structures are electrically connected to the functional circuitry of said at least one of said dies," and claim 52 recites that "the shielding plane comprises openings through which the means for receiving a test signal is electrically connected to the functional circuitry of said at least one of said dies." Applicants respectfully assert that Slupsky and Rostoker do not teach or render obvious such features.

As still another example, claims 51 and 53 recite that "the shielding plane is a solid plate structure." Rostoker cannot be modified by replacing the grid lines with a solid plate. As mentioned above, Rostoker's grid lines comprise individual conductive traces each for carrying power or ground to Rostoker's dies or for use as individual probe and sense lines (Rostoker col. 5, lines 66-67). Each grid line must therefore be electrically insulated from every other grid line. Otherwise, the power, ground, and signals on the probe and sense lines would short together. If the grid lines were replaced with a solid plate, there would be no way to provide separate power and ground to Rostoker's dies, nor would it be possible to probe and sense individual signals. For at least this reason, Rostoker cannot be modified by replacing the grid lines with a solid plate.

Moreover, a solid plate provides advantages and unexpected results as compared to Rostoker's grid lines. For example, because a plate is solid but grid lines include spaces between the lines, a solid plate is a better shield against electromagnetic radiation than are grid lines.

That is, the spaces between Rostoker's grid lines make the grid lines a less effective shield than a solid plate.

For at least the foregoing reasons, claims 51 and 53 further distinguish over Slupsky and Rostoker.

Claims 39 and 44 were rejected under 35 U.S.C. 103(a) as unpatentable over Slupsky, Rostoker, and U.S. Patent No. 7,067,909 to Reif et al. ("Reif"). Reif, however, does not make up for the deficiencies in Slupsky and Rostoker discussed above with respect to claims 16 and 27. Claims 39 and 44, which depend respectively from claim 16 or claim 27, are therefore patentable at least for the reasons discussed above with respect to claim 16.

In view of the foregoing, Applicants submit that all objections and rejections are overcome and all of the pending claims are allowable and the application is in condition for allowance. If the Examiner believes that a discussion with Applicants' attorney would be helpful, the Examiner is invited to contact the undersigned at (801) 323-5971.

Respectfully submitted,

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